COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

CPFilms Inc.
P. O. Box 170, Axton, VA 24054
Permit No. BRRO-30877

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, CPFilms Inc. has applied for a Title V Operating Permit renewal for its solar controlled window film manufacturing plant in Axton, Virginia. The Department reviewed the application for permit renewal and prepared a revised draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: 10-16-14
Pamela J. Derk
540-562-6732

Regional Air Permit Manager: _____ Date: 10/16/14
David J. Brown

Regional Director: _____ Date: 10/16/14
Robert J. Weld

FACILITY INFORMATION

Permittee
CPFilms Inc.
575 Maryville Centre Drive
St. Louis, MO 63141

Facility
CPFilms Inc.
47 Brenda Drive
Axton, VA 24054

AIRS No.: 51-089-0091
Registration No.: 30877

SOURCE DESCRIPTION

NAICS code 326130: Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing
SAIC code 3083: Laminated Plastics Plate, Sheet, and Profile Shapes

The facility manufactures polyester-based window film used in the automotive, electronics and industrial building industries. This facility was constructed in 1985 by Commonwealth Film Processing. The company sold to Martin Processing Inc. and then Courtaulds Performance Films (now CPFilms Inc.) The current parent company of CPFilms Inc. is Solutia, Inc. (owned by Eastman Chemical Company).

The facility's operation consists of two continuous polyester film dye lines that are used to dye the polyester substrate prior to further processing at the CPFilms Inc. Fieldale, Virginia facility, (Registration #30294) or is sold to other window film product manufacturers. Each dye line at the Axton facility is rated at 48,750 ft² film/hr and consists of the following: an unwinding station, dye mixing tank, heated ethylene glycol (EG) dye bath, N-Methyl-2-Pyrrolidone (NMP) wash bath, two water wash baths, a dryer and a rewinding station. The dispersive powdered dyes are mixed in EG tanks and pumped to the dye bath. The web film passes through the heated dye bath where the dye penetrates the film. The EG emissions from the dye bath are collected by exhaust hoods, which have a designed capture efficiency of 95%. The captured EG emissions are recovered for reuse by the EG recovery system; the EG recovery system consists of a pre-cooler in series with a Brinks mist eliminator and storage tanks.

Following the dye bath the film is washed in NMP and two in-line water baths to remove the excess dyes. The NMP baths, water wash baths and dryers do not have exhaust hoods or VOC emissions control devices. The NMP emissions are vented through the building's roof and wall vents. After rinsing the film is fed through a convection dryer. Each dye line dryer has three 1.2 MMBtu/hr burners which are fueled by propane.

The facility is a Title V major source due to potential VOC emissions exceeding 100 tons/yr and potential individual HAPs exceeding 10 tons/yr and combined HAPs exceeding 25 tons/yr.

Currently, 40 CFR 63 Subpart DDDDDD (Boiler MACT) applies to the facility, as its two natural-gas fired process heaters (Units #15 and #16) are subject. According to Blue Ridge Regional Office's air compliance records, the facility has submitted its initial notification to EPA and Virginia in a timely manner.

There are no other NSPS or MACT regulations that have been determined to apply to the facility. The source has traditionally maintained that the requirements of 40 CFR 63 Subpart JJJJ - National Emission Standard for Hazardous Air Pollutants: Paper and Other Web Coating, does not apply to the facility because that MACT covers coating operations and this facility only involves dyeing. In a determination dated March 19, 2014, EPA Region III communicated its determination that MACT JJJJ (Paper and Other Web Coating MACT) did not apply to the dye lines at this facility. MACT 40 CFR 63 Subpart OOOO - National Emission Standard for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles, does not apply because it covers the coating and dyeing of fabric, not film.

This facility is located in an attainment area for all pollutants. It is not a Prevention of Significant Deterioration (PSD) major source due to federally-enforceable State Operating Permit (SOP) limits that restrict the potential emissions of VOC to less than 250 tons/yr. The facility's SOP, dated January 8, 1999, as amended February 27, 2001 and June 8, 2007, was issued to effectively limit facility to be below PSD thresholds for VOCs.

The facility's original Title V operating permit was issued on September 28, 2001, and renewed on July 5, 2007. The applicant submitted a Title V permit application for a renewal on June 29, 2011, with addendum information dated July 28, 2011. The application was deemed timely and complete on August 25, 2011, therefore is eligible for application shield which extends the terms of the current Title V permit until renewal.

COMPLIANCE STATUS

The facility supplied the DEQ and EPA with Subpart DDDDDD initial applicability notification on May 6, 2013. A full compliance evaluation of this facility, including a site visit, was last conducted on July 31, 2013. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emission units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	Pollutant Controlled	Applicable Permit Date/ Regulatory Standard
Process Units						
01	01	#5 Dye Line, includes dye bath, wash baths and dryer.	48,750 ft²/hour	Brinks (2000) Mist Eliminator with pre-cooler (EG Recovery System)	VOC / EG	SOP June 8, 2007
02	02	#6 Dye Line, includes dye bath, wash baths and dryer.	48,750 ft²/hour	Brinks (2000) Mist Eliminator with pre-cooler (EG Recovery System)	VOC / EG	SOP June 8, 2007
15	15	Number 5 Dye Line Process Heater – natural gas	3.5 MMBtu/ hr	n/a		MACT DDDDD
16	16	Number 6 Dye Line Process Heater – natural gas	3.5 MMBtu/ hr	n/a		MACT DDDDD

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY – Actual Emissions

Actual plant emissions for calendar year 2013 were submitted on April 15, 2014 and are summarized as follows:

2013 Actual Pollutant Emissions in Tons per Year			
	Ethylene Glycol (EG) Hazardous Air Pollutant / VOC	N-methyl-2-pyrrolidone (NMP) - VOC	VOC
TOTAL (Stack and fugitive emissions)	55.7	25.2	79.9

EMISSION UNIT APPLICABLE REQUIREMENTS – (Dye Lines #5 and #6)

Limitations:
The following limits for Dye Lines #5 and #6 are carried forward from the previous Title V permit and the State Operating Permit dated June 8, 2007. The basis for inclusion in Title V is State Operating Permit Regulations under 9 VAC 5-80-800 et seq. and 9 VAC 5-80-110.

- Title V Condition 1: Volatile organic compound (VOC) emissions from each dye bath shall be controlled by a fume capture hood and an ethylene glycol (EG) recovery system (pre-cooler in series with a Brinks mist eliminator). (Condition 2 of June 8, 2007 SOP)
- Title V Condition 2: The EG recovery system shall demonstrate a control efficiency by stack test[1] of no less than 95% on a mass balance. (9 VAC 5-80-110 and Condition 3 of June 8, 2007 SOP)
- Title V Condition 3: The exit air temperature from each EG recovery system exhaust stack shall be maintained at ≤100° F, and specifies actions be taken if temperature exceed 110° F. (Condition 12 of June 8, 2007 SOP)
- Title V Condition 4: The minimum pressure drop across the dye bath capture system is -0.25 inches of water, and specifies actions to be taken if the pressure drop is -0.24 inches of water or less. (Condition 13 of June 8, 2007 SOP)
- Title V Condition 5: The pressure drop across each Brinks demister shall not be less than 4.0 inches of water or be greater than 12.0 inches of water, and specifies action to be taken if the pressure drop is outside of the prescribed range. (Condition 14 of June 8, 2007 SOP)
- Title V Condition 6: Visible emissions from the facility's roof exhaust vents, wall exhaust vents and EG recovery system exhaust stacks is limited to 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity. (Condition 18 of June 8, 2007 SOP)
- Title V Condition 7: VOC emissions from the operation of each EG recovery system shall not exceed 14.54 lbs/hr. (Condition 16 of June 8, 2007 SOP)
- Title V Condition 8: Total VOC emissions from the window film manufacturing facility shall not exceed 248.0 tons/yr. (Condition 17 of June 8, 2007 SOP)

Monitoring
The following monitoring requirements for Dye Lines #5 and #6 are carried forward from the previous Title V permit and the State Operating Permit dated June 8, 2007. The basis for inclusion in Title V is State Operating Permit Regulations under 9 VAC 5-80-800 et seq. and 9 VAC 5-80-110.

- Title V Condition 9: Each EG recovery system shall be equipped with a device to continuously measure and record exhaust temperature. (Condition 5 of June 8, 2007 SOP)

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1 The source was required to perform an initial stack test on the inlet and outlet of one of the EG recovery systems to demonstrate compliance with the 95% control efficiency requirement and the 14.54 lb/hr VOC emission limit. Initial Stack test dated 8/28/01 demonstrated compliance, certified by 10/19/01 DEQ compliance inspection report.

- Title V Condition 10: Each EG recovery system shall be equipped with an audible alarm to alert the operator when the exhaust temperature reaches 110° F. (Condition 6 of June 8, 2007 SOP)
- Title V Condition 11: Each EG recovery system shall be equipped with a device to continuously measure the pressure drop across the Brinks demister. (Condition 7 of June 8, 2007 SOP)
- Title V Condition 12: The monitoring device used to continuously measure the pressure drop across each Brinks demister shall be observed by the permittee with a frequency of not less than once per day, that the dye line operated. (Condition 8 of June 8, 2007 SOP)
- Title V Condition 13: Each dye bath fume capture hood exhaust duct shall be equipped with a device to continuously measure the pressure drop across the fume capture system. (Condition 9 of June 8, 2007 SOP)
- Title V Condition 14: The monitoring device used to continuously measure the pressure drop across each dye bath fume capture system shall be observed by the permittee with a frequency of not less than once per shift that the dye line operated. (Condition 10 of June 8, 2007 SOP)
- Title V Condition 21: Periodic monitoring requirements for opacity from the facility are based on observation of the presence or absence of visible emissions. In the event visible emissions are observed, corrective action is required, or VEE's as determined by EPA Method 9 are required to demonstrate compliance with the applicable opacity limit.

Compliance Assurance Monitoring (CAM)
According to EPA's Applicability Criteria, from 40 CFR 64.2(a), CAM applies to an emission unit if that unit (1) has the potential to emit (in the absence of add-on controls) a regulated pollutant in an amount that exceeds its major source threshold, (2) is subject to an emission limitation for that pollutant, and (3) uses a control device to achieve compliance with the emission limitation. Dye Lines #5 and #6 meet all three of these applicability criteria for the CAM rule to apply:

The following monitoring conditions are for equipment subject to CAM (9 VAC 5-80-110 E (Article 1)):

- Title V Condition 15: Monitor, operate, calibrate and maintain the following Compliance Assurance Monitoring (CAM)-affected units: Dye Lines 5 & 6 controlled by EG Recovery System according to CAM Plan in Attachment A of the permit. (9 VAC 5-80-110 E (Article 1))
- Title V Condition 16: Conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9. (40 CFR 64.6 (c))
- Title V Condition 17: Maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. (40 CFR 64.7 (b))
- Title V Condition 18: Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in

continuous operation (or shall collect data at all required intervals) at all times that Dye Lines 5 & 6 controlled by EG Recovery System is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions. (40 CFR 64.7 (c))

- Title V Condition 19: Upon detecting an excursion or exceedance, the permittee shall restore operation of the Dye Lines 5 & 6 controlled by EG Recovery System (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable. (40 CFR 64.7 (d)(1))
- Title V Condition 20: Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. (40 CFR 64.7(d)(2))

Recordkeeping

The following record keeping requirements for Dye Lines #5 and #6 are carried forward from the previous Title V permit and the State Operating Permit dated June 8, 2007. The basis for inclusion in Title V is State Operating Permit Regulations under 9 VAC 5-80-800 et seq. and 9 VAC 5-80-110. CAM record keeping conditions are taken from the DEQ Title V boilerplate (9 VAC 5-80-110 E (Article 1)) for equipment subject to CAM.

- Title V Condition 23: Maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. These records shall include, but are not limited to:
  a. Emission calculations for VOCs from the dye lines (Ref. Nos. 5 & 6);
  b. Control device monitoring records for each EG recovery system's exhaust stack temperature, dye bath fume capture system pressure drop, and demister pressure drop. The operating parameter logs shall include the date and time, name of the observer, the value of the parameter observed, and any corrective action;

c. Scheduled and unscheduled maintenance and operator training;
d. Monthly and annual operating hours of each dye line (Ref. Nos. 5 & 6), calculated as the sum of each consecutive 12-month period;
e. Results of all performance tests; and
f. The results of the weekly and/or monthly opacity observation of all emissions points and any corrective actions to reduce emissions to normal operating conditions.
(Condition 22 of June 8, 2007 SOP)

- Title V Condition 24: CAM - Maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). (40 CFR 64.9(b))
- Title V Condition 12: Keep a log of the pressure drop observations from each EG recovery system. (Condition 8 of June 8, 2007 SOP)
- Title V Condition 13: Keep a log of the pressure drop observations from each dye bath fume capture hood exhaust duct. ((Condition 10 of June 8, 2007 SOP)
- Title V Condition 14: Maintain a visual observation log for each of the EG recovery system exhaust stacks, roof vents and wall vents to demonstrate compliance. The log shall include the date, time and location of the observations, name of the observer, whether or not there were visible emissions, any VEE recordings and any necessary corrective action.
- Title V Condition 22: Take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:
  a. develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance
  b. maintain an inventory of spare parts;
  c. have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum; and
  d. train operators in the proper operation of all air pollution control equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
  (Conditions 15 and 28 of June 8, 2007 SOP)

Testing

Stack testing is not required by this permit, but can be requested of the facility by DEQ and EPA. Title V Condition 25: Test ports are to be provided at the appropriate locations upon request by the DEQ. (Condition 11 of June 8, 2007 SOP)

Reporting

The following reporting requirements for Dye Lines #5 and #6 are carried forward from the previous Title V permit and the State Operating Permit dated June 8, 2007. The basis for inclusion in Title V is State Operating Permit Regulations under 9 VAC 5-80-800 et seq. and 9

VAC 5-80-110. CAM reporting conditions are taken from the DEQ Title V boilerplate (9 VAC 5-80-110 E (Article 1)) for equipment subject to CAM.

- Title V Condition 26: The details of all stack tests are to be arranged with the Blue Ridge Regional Office. (9 VAC 5-80-1180)

- Title V Condition 27: CAM - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Blue Ridge Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters VAC 5-80-110 E (Article 1) and 40 CFR 64.7(e))

- Title V Condition 28: CAM - If the number of exceedances or excursions exceeds 5 percent duration of the operating time for the Dye Lines 5 & 6 controlled by EG Recovery System for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:
    a. Improved preventative maintenance practices;
    b. Process operation changes;
    c. Appropriate improvements to control methods;
    d. Other steps appropriate to correct control performance; and
    e. More frequent or improved monitoring.

  (9 VAC 5-80-110 E (Article 1) and 40 CFR 64.8(a) and (b))

- Title V Condition 29: CAM - Submit CAM reports as part of the Title V semi-annual monitoring reports required by General Condition 47 of the permit to the Blue Ridge Regional Office. Such reports shall include at a minimum:
    a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
    b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
    c. A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the

implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.
9VAC 5-80-110 F and 40 CFR 64.9(a))

See General Conditions for additional reporting requirements.

Fuel Burning Equipment Requirements – No. 5 Dye Line Process Heater (Unit #15) and No. 6 Dye Line Process Heater (Unit #16)

Limitations

- Title V Condition 30: The permittee shall comply with the applicable requirements of National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD as listed in Conditions 31 through 36 by the applicable compliance date as specified in §63.7495(b).
  (9VAC 5 80-110 and 40 CFR Part 63.7495)

- Title V Condition 31: The permittee shall comply with the work practice standards specified in 40 CFR 63.7500(e).
  (9VAC VAC 5 80-110 and 40 CFR 63.7500)

- Title V Condition 32: The permittee shall comply with the applicable work practice tune-up requirements specified in 40 CFR 63.7515(d).
  (9 VAC 5 80-110 and 40 CFR 63.7515)

- Title V Condition 33: The permittee shall comply with the initial compliance demonstration for the work practice standards specified in 40 CFR 63.7530(d) and (e).
  (9 VAC 5 80-110 and 40 CFR 63.7530)

- Title V Condition 34: The permittee shall comply with the continuous compliance requirements specified in 40 CFR 63.7540(a)(12) and (b).
  (9 VAC 5 80-110 and 40 CFR 63.7540)

Notifications

- Title V Condition 35: The permittee shall comply with the notification requirements specified in 40 CFR 63.7545(a) and (e).
  (9 VAC 5 80-110 and 40 CFR 63.7545)

Reporting

- Title V Condition 36: The permittee shall comply with the reporting requirements specified in 40 CFR 63.7550(a)(b) and (c).
  (9 VAC 5 80-110 and 40 CFR 63.7550)

See General Conditions for additional reporting requirements.

COMPLIANCE DEMONSTRATION

Because the initial performance test indicated that when operating at permitted operating parameters, VOC emissions met the lb/hr emission limit, monitoring and recordkeeping requirements for the EG recovery system indicators are considered to be sufficient monitoring for VOC for Dye Lines #5 and #6.

The source continuously monitors and records the EG recovery system exhaust stack temperature to demonstrate compliance to the 100° F limit. The EG dye bath fume capture system's collection efficiency will be demonstrated by maintaining a minimum 0.25" WC vacuum in the stationary ducts leading to the EG recovery system, which is connected directly to the fume capture hood. The fume capture system almost completely encloses each EG dye tank, and the negative pressure in the duct captures most vapors. The source monitors the pressure drop across the EG recovery system demister and records the indicated pressure drop at least once per shift.

Emissions from the film dying processes are calculated using material balance to demonstrate compliance with VOC emission limits. The consecutive 12-month period sum shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. These records shall identify and include the source of all data used to perform the calculations as well as justification for any assumptions or emissions factors.

Compliance with opacity limits are based on observation of the presence or absence of visible emissions. In the event visible emissions are observed, corrective action is required, or VEE's as determined by EPA Method 9 are required to demonstrate compliance with the applicable opacity limit

MACT DDDDDD: The process heaters that are subject to 40 CFR 63 Subpart DDDDDD requirements are in the category of small, gas-fired process heaters. The energy efficiency (tune-up) and work-practice standards apply to the facility upon the compliance date of the MACT. The facility will show proof of the tune-up, performed by a certified entity, as well as provide documentation of compliance, monitoring, recordkeeping and reporting according to the Subpart. These small natural gas-fired process heaters that are properly maintained are not considered a source of visible emissions; the MACT obligations serve to ensure that the units are properly maintained.

Streamlined Requirements
No applicable requirements have been streamlined in this Title V permit renewal.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Permit Expiration (Conditions 38, 39, 40, 41, 42 and 43)
These conditions refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §§2.2-604 and §§10.1-1185 of the *Code of Virginia,* and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

These general conditions cite the Article that follows:
Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

These general conditions cite the sections that follow:
9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications

Failure/Malfunction Reporting (Conditions 48 and 49)
Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

Permit Modification (Condition 53)
This general condition cites the sections that follow:
9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

Malfunction as an Affirmative Defense (Conditions 67, 68, 69 and 70)
The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition 48 and General Condition 49. For further explanation see the comments on general conditions 48 and 49.

These general conditions cite the sections that follow:
9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110. Permit Content

Asbestos Requirements (Condition 74)
The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:
40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:
9 VAC 5-60-70. Designated Emissions Standards
9 VAC 5-80-110. Permit Content

STATE ONLY APPLICABLE REQUIREMENTS
Not applicable.

FUTURE APPLICABLE REQUIREMENTS
No future applicable requirements have been identified for this facility.

INAPPLICABLE REQUIREMENTS
The permittee has not identified any inapplicable requirements in the permit application.

The Department has determined that the following requirements are not applicable:
NSPS – The NSPS regulations do not apply to any of the equipment at this facility.

MACT – MACT, 40 CFR 63 Subpart JJJJ, does not apply to the facility because that MACT covers coating operations and this facility only involves dyeing. MACT, 40 CFC 63 Subpart OOOO does not apply because it specifies the coating and dyeing of fabric and other substrates, but not the film dying process that CPFilms Inc. uses.

Greenhouse Gas (GHG) Emissions: There are no applicable GHG permitting requirements.

COMPLIANCE PLAN

CPFilms Inc. is currently documented as being in compliance with all applicable requirements. No compliance plan was required to be included in the application or in the permit.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units as contained in the permit are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

CONFIDENTIAL INFORMATION

CPFilms Inc. did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit renewal was placed in the *Martinsville Bulletin* newspaper, Martinsville, Virginia, on August 28, 2014. The affected state of North Carolina and interested parties on the Title V mailing list were sent a copy of the public notice by either e-mail or postal mail on August 27, 2014. Public comments were accepted from August 28, 2014 through September 29, 2014. No comments were received from the public regarding the draft permit and a public hearing was not required.

Region 3 of the EPA was notified of the public notice by e-mail on August 26, 2014, with the 45-day EPA review period expiring on October 14, 2014, with no comments received.